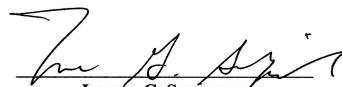


Case 1:21-cv-04529-LGS-JLC Document 72 Filed 10/14/21 Page 1 of 2
The application is GRANTED in part. Discovery will remain stayed while Plaintiffs pursue recovery in connection with the SEC-administered Fair Fund. Defendant Guo's motion to dismiss is DENIED without prejudice to renewal. The parties shall submit a joint status letter by December 13, 2021, and every sixty (60) days thereafter, advising the Court on the status of Plaintiffs' ability to recover in connection with the SEC-administered Fair Fund. The parties shall promptly advise the Court when it is determined that discovery can proceed or the case can be dismissed.

Hon. Lorna G. Schofield
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Dated: October 14, 2021
New York, New York



LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Re: Weiguo Sun, et al. v. GTV Media Group, Inc., et al., No. 1:21-cv-04529-LGS

Dear Judge Schofield:

We represent Plaintiffs in the above-captioned action and write jointly with counsel for Defendants GTV Media Group, Inc. ("GTV"), Saraca Media Group, Inc. ("Saraca"), and Wengui Guo ("Guo") (collectively, the "Represented Parties"). As stated in the Represented Parties' September 27, 2021 joint letter (ECF No. 66), the Represented Parties have conferred regarding the effect of the recent settlement with the Securities and Exchange Commission set forth in a September 13, 2021 cease and desist order. See *In the Matter of GTV Media Group, Inc., Saraca Media Group, Inc., and Voice of Guo Media, Inc.*, 3-20537.

Pursuant to the settlement, Defendants GTV, Saraca, and Voice of Guo Media, Inc. ("VOG") are required to pay to the SEC disgorgement, interest, and civil penalties in excess of \$500 million to settle regulatory claims in connection with two securities offerings, including the offering at issue in this case. While GTV and Saraca do not admit to the SEC's findings or to any liability in this litigation, as part of the settlement agreement, they have agreed to return monies to investors through the establishment of an SEC-administered Fair Fund. As a result of this settlement and the SEC's establishment of a Fair Fund, Plaintiffs may be able to recover, completely or partially, the money that, as alleged in the Complaint, they invested in the offering. See ECF No. 1.

Presently, the Represented Parties do not know the status of the Fair Fund and the extent to which Plaintiffs might recover. The Represented Parties have agreed that to avoid incurring further costs in this litigation while Plaintiffs pursue their rights in the Fair Fund, a partial stay of this action would be appropriate. The Represented Parties therefore request that the Court enter an order staying this action as against Defendants GTV, Saraca, and Guo pending establishment and distribution of the Fair Fund, including a stay of all discovery and proceedings related to Defendant Guo's partial motion to dismiss.

Brian.Lanciault@ThompsonHine.com Fax: 212.344.6101 Phone: 212.908.3945



Hon. Lorna G. Schofield
October 8, 2021
Page 2

Plaintiffs submit that Plaintiffs' motion for default judgment against Defendants VOG and Lihong Wei Lafrenz and any subsequent related proceedings should not be included in the stay, as the default motion has been fully briefed and submitted and is scheduled to be heard on October 14, 2021. *See* ECF No. 63. Defendants GTV, Saraca, and Guo take no position on that issue.

Respectfully submitted,

THOMPSON HINE LLP

/s/ Brian P. Lanciault, Jr.

Brian P. Lanciault, Jr.
335 Madison Avenue, 12th Floor
~~NEW YORK, NY 10017~~
T: 212.344.5680
F: 212.344.6101
Brian.Lanciault@thompsonhine.com

Steven A. Block (*pro hac vice*)
20 N. Clark Street, Suite 3200
Chicago, IL 60602
T: 312.998.4240
F: 312.998.4245
Steven.Block@thompsonhine.com

~~Attorneys for Plaintiff~~

SCHULMAN BHATTACHARYA, LLC

/s/ Jeffrey S. Gavenman

Jeffrey S. Gavenman
6116 Executive Blvd., Suite 425
North Bethesda, Maryland 20852
T: (240) 356-8550
F. (240) 356-8558
jgavenman@schulmanbh.com

Attorney for Defendant Wengui Guo

LAWALL & MITCHELL, LLC

/s/ Aaron A. Mitchell

Aaron A. Mitchell
162 East 64th Street
New York, New York 10065
(973) 285-3280
aaron@lmesq.com

Attorney for Defendants GTV Media Group, Inc. and Saraca Media Group, Inc.